

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CONSTELLATION DESIGNS, LLC,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	
LG ELECTRONICS INC., LG	§	CIVIL ACTION NO. 2:21-CV-00448-
ELECTRONICS USA, INC., and LG	§	JRG
ELECTRONICS ALABAMA, INC,	§	
	§	
<i>Defendants.</i>	§	

VERDICT FORM

In answering the following questions and completing this Verdict Form, you are to follow all the instructions that I have given you in the Court’s Final Jury Instructions. Your answers to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Final Jury Instructions. You should refer to and consider the Final Jury Instructions as you answer the questions in this Verdict Form.

As used in this Verdict Form, the following terms have the following meanings:

- **“Plaintiff”** or **“Constellation Designs”**, refers to Constellation Designs, LLC.
- **“Defendants”** or **“LG”** refers to LG Electronics Inc., LG Electronics U.S.A., Inc., and LG Electronics Alabama, Inc.
- The **“’761 patent”** refers to U.S. Patent No. 8,842,761.
- The **“’700 patent”** refers to U.S. Patent No. 10,693,700.
- The **“’509 patent”** refers to U.S. Patent No. 11,019,509.
- The **“’922 patent”** refers to U.S. Patent No. 11,018,992.
- The **“Asserted Claims”** refers to claims 17, 21, 24 and 28 of the ’761 patent; claim 5 of the ’700 patent; claims 21 and 23 of the ’509 patent; and claims 24 and 44 of the ’922 patent.

**IT IS VERY IMPORTANT THAT YOU FOLLOW THE
INSTRUCTIONS PROVIDED IN THIS VERDICT FORM**

**READ THEM CAREFULLY AND ENSURE THAT YOUR VERDICT
COMPLIES WITH THEM**

QUESTION NO. 1

Did Constellation Designs, the Plaintiff, prove by a preponderance of the evidence that LG, the Defendants, infringed **ANY** of the Asserted Claims of the following patents?

For each patent below, please answer “Yes” or “No.”

'761 patent Yes: ✓ No: _____

'700 patent Yes: ✓ No: _____

'509 patent Yes: ✓ No: _____

'922 patent Yes: ✓ No: _____

QUESTION NO. 2

Did the LG, the Defendants, prove by clear and convincing evidence that **ANY** of the following Asserted Claims are invalid?

For each claim below, please answer “Yes” or “No.”

'761 patent

Claim 17 of the '761 patent: Yes: _____ No: ✓

Claim 21 of the '761 patent: Yes: _____ No: ✓

Claim 24 of the '761 patent: Yes: _____ No: ✓

Claim 28 of the '761 patent: Yes: _____ No: ✓

'700 patent

Claim 5 of the '700 patent: Yes: _____ No: ✓

'509 patent

Claim 21 of the '509 patent: Yes: _____ No: ✓

Claim 23 of the '509 patent: Yes: _____ No: ✓

'922 patent

Claim 24 of the '922 patent: Yes: _____ No: ✓

Claim 44 of the '922 patent: Yes: _____ No: ✓

If you answered “NO” to ALL Asserted Claims in Question No. 1, OR “YES” to ALL Asserted Claims in Question No. 2, then DO NOT answer Question No. 3.

Answer Question No. 3 ONLY as to any Asserted Claim that you have found in Question Nos. 1 and 2 to be BOTH infringed AND not invalid.

QUESTION NO. 3

Did Constellation Designs, the Plaintiff, prove by a preponderance of the evidence that LG, the Defendants, willfully infringed **ANY** of the Asserted Claims that you found were infringed and not invalid?

Yes: ✓ No:

If you answered “NO” to ALL Asserted Claims in Question No. 1, OR “YES” to ALL Asserted Claims in Question No. 2, then DO NOT answer Question No. 4.

Answer Question No. 4 ONLY as to any Asserted Claim that you have found in Question Nos. 1 and 2 to be BOTH infringed AND not invalid.

QUESTION NO. 4

What sum of money, if paid now in cash as a reasonable royalty, has Constellation Designs, the Plaintiff, proven by a preponderance of the evidence would compensate it for its damages for LG's, the Defendants, infringement?

Answer in United States Dollars and Cents, if any:

\$ 1, 684, 409

Does the amount awarded in Question 4, if any, include damages for the Realtek chips?

Yes: ✓ No:

FINAL PAGE OF THE JURY VERDICT FORM

You have now reached the end of the Verdict Form and should review it to ensure that it accurately reflects your unanimous determinations. The Jury Foreperson should then sign and date the Verdict Form in the spaces below. Once this is done, notify the Court Security Officer that you have reached a verdict. The Jury Foreperson should keep the Verdict Form and bring it when the jury is brought back into the courtroom.

Signed this 11 day of July, 2023.

Jury Foreperson